



*Where ideas connect*

Department of Environmental Quality  
Division of Air Quality

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## Title V Operating Permit

**PERMIT NUMBER: 4900017001**

**DATE OF PERMIT: April 10, 2003**

Date of Last Revision: April 10, 2003

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This Operating Permit is issued to, and applies to the following:

**Name of Permittee:**

Pacific States Cast Iron Pipe Company  
PO Box 1219  
Provo, UT 84603

**Permitted Location:**

Pipe Casting Plant  
2550 South Industrial Parkway  
Provo, UT 84606

UTM coordinates: 4,449,760 meters Northing, 446,250 meters Easting  
SIC code: 3321

## ABSTRACT

Pacific States Cast Iron Pipe Company produces various sizes of iron pipe in Utah County, a non-attainment area for the National Ambient Air Quality Standard for PM<sub>10</sub>. The iron pipe production process includes melting, core preparation, casting, annealing, lining, coating, and special lining operation. This source is a major source of CO and VOC.

## UTAH AIR QUALITY BOARD

By:

Richard W. Sprott, Executive Secretary

Prepared By:

Jennifer He

**Operating Permit History**

4/10/2003 - Permit issued	Action initiated by an initial operating permit application	
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**Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.**

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

**Section I: General Provisions**

**I.A. Federal Enforcement.**

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

**I.B. Permitted Activity(ies).**

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

**I.C. Duty to Comply.**

I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))

I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))

I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))

I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay

any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

**I.D. Permit Expiration and Renewal.**

I.D.1 **This permit is issued for a fixed term of five years and expires on April 10, 2008.** (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due by October 10, 2007. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

**I.E. Application Shield.**

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

**I.F. Severability.**

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

**I.G. Permit Fee.**

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

**I.H. No Property Rights.**

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

**I.I. Revision Exception.**

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

**I.J. Inspection and Entry.**

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

**I.K. Certification.**

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

**I.L. Compliance Certification.**

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than **October 1, 2003** and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such

methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.
- I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice  
(mail code 8ENF)  
EPA, Region VIII  
999 18th Street, Suite 300  
Denver, CO 80202-2466

**I.M. Permit Shield.**

- I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:
- I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))
- I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))
- I.M.2 Nothing in this permit shall alter or affect any of the following:
- I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))
- I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))
- I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

**I.N. Emergency Provision.**

I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))

I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))

I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))

I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))

I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))

I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

**I.O. Operational Flexibility.**

Operational flexibility is governed by R307-415-7d(1).

**I.P. Off-permit Changes.**

Off-permit changes are governed by R307-415-7d(2).

**I.Q. Administrative Permit Amendments.**

Administrative permit amendments are governed by R307-415-7e.



I.R.        **Permit Modifications.**

Permit modifications are governed by R307-415-7f.

I.S.        **Records and Reporting.**

I.S.1        Records.

I.S.1.a        The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b        For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1        The date, place as defined in this permit, and time of sampling or measurement.

I.S.1.b.2        The date analyses were performed.

I.S.1.b.3        The company or entity that performed the analyses.

I.S.1.b.4        The analytical techniques or methods used.

I.S.1.b.5        The results of such analyses.

I.S.1.b.6        The operating conditions as existing at the time of sampling or measurement.

I.S.1.c        Additional record keeping requirements, if any, are described in Section II, Special Provisions.

I.S.2        Reports.

I.S.2.a        Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))

I.S.2.b        All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))

I.S.2.c        The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3 Notification Addresses.

I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality  
P.O. Box 144820  
Salt Lake City, UT 84114-4820  
Phone: 801-536-4000

I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII  
Office of Enforcement, Compliance and  
Environmental Justice (mail code 8ENF)  
999 18th Street, Suite 300  
Denver, CO 80202-2466

For reports, notifications, or other correspondence  
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII  
Office of Partnerships & Regulatory Assistance  
Air & Radiation Program (mail code 8P-AR)  
999 18th Street, Suite 300  
Denver, CO 80202-2466  
Phone: 303-312-6440

I.T. **Reopening for Cause.**

I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2            Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U.            **Inventory Requirements.**

I.U.1            An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.U.2            A Hazardous Air Pollutant Inventory shall be submitted in accordance with the procedures of R307-155, Hazardous Air Pollutant Inventory. (R307-155)

## **Section II: SPECIAL PROVISIONS**

### **II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.**

(R307-415-4(3)(a) and R307-415-4(4))

- II.A.1      **Cupola** (designated as Emission unit #1)  
Unit Description: Cupola with emissions controlled by a new baghouse (with a reagent silo and a bin vent) and CO burner system. The old wet scrubber has been permanently removed.
- II.A.2      **Desulfurization and Ductile System** (designated as Emission unit #2)  
Unit Description: Desulfurization and ductile treatment system with emissions controlled by a fume hood with a baghouse (no stack).
- II.A.3      **Annealing oven** (designated as Emission unit #3)  
Unit Description: Natural gas and oil burners heat the ductile iron pipe. No unit-specific applicable requirements.
- II.A.4      **Core sand silo** (designated as Emission unit #4)  
Unit Description: Core sand silo with emissions controlled by a bin vent.
- II.A.5      **Core sand handling and core making** (designated as Emission unit #5)  
Unit Description: Core sand handling and core making system with emissions controlled by a baghouse.
- II.A.6      **Sand coating process** (designated as Emission unit #6)  
Unit Description: Sand is heated and mixed with resin and Hexa with emissions controlled by a wet scrubber and a baghouse (share the same baghouse with Emission Unit #5).
- II.A.7      **Pipe drying boiler** (designated as Emission unit #7)  
Unit Description: Natural gas and oil boiler heats the pipe. No unit-specific applicable requirements.
- II.A.8      **Cement lining cement silo** (designated as Emission unit #8)  
Unit Description: Cement lining cement silo with emissions controlled by a bin vent.
- II.A.9      **Cement lining sand silo** (designated as Emission unit #9)  
Unit Description: Cement lining sand silo with emissions controlled by a bin vent.
- II.A.10     **Pipe coating** (designated as Emission unit #10)  
Unit Description: Pipe coating with emissions controlled by a wet scrubber. No unit-specific applicable requirements.
- II.A.11     **Special lining operation** (designated as Emission unit #11)  
Unit Description: Including special lining shot blast with emissions controlled by a baghouse, natural gas fired special lining oven, special lining application with emissions controlled by a wet scrubber, special lining painter, and special lining grinding.
- II.A.12     **Clarifier cement silo** (designated as Emission unit #12)  
Unit Description: Clarifier cement silo with emissions controlled by a bin vent.
- II.A.13     **Casting Cooling Tower** (designated as Emission unit #13)  
Unit Description: Casting cooling tower No unit-specific applicable requirements.
- II.A.14     **Miscellaneous** (designated as Emission unit #14)  
Unit Description: Storage piles, grinding, hot metal transfer, charge handling and casting operations, and casting operations baghouse (share the same baghouse with Emission Unit #2).
- II.A.15     **VOC and HAP Emission units** (designated as Emission unit #15)  
Unit Description: Including Cupola (Emission Unit #1), Pipe coating (Emission Unit #10), the operations associated with pipe coating, and special lining operation (Emission Unit #11).

**II.B. Requirements and limitations.**

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

**II.B.1 Conditions on permitted source (Source-wide)**

**II.B.1.a Condition:**

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected emission units, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-5; condition originated in DAQE-AN0794008-02]

**II.B.1.a.1 Monitoring:**

Records required for this permit condition will serve as monitoring.

**II.B.1.a.2 Recordkeeping:**

Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.

**II.B.1.a.3 Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

**II.B.1.b Condition:**

The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Authority granted under 40 CFR 82.150(b); condition originated in 40 CFR 82.150(b)]

**II.B.1.b.1 Monitoring:**

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

**II.B.1.b.2 Recordkeeping:**

All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

**II.B.1.b.3 Reporting:**

All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.c

**Condition:**

Emissions from sources of fugitive dust shall be minimized. The permittee shall develop and implement a fugitive dust control plan, approved by the Executive Secretary, that minimizes fugitive dust. Compliance shall be based on the permittee adhering to the most recently approved fugitive dust control plan. Natural sources of dust and fugitive emissions are not fugitive dust within the meaning of this condition. [Authority granted under R307-309-4; condition originated in DAQE-AN0794008-02]

II.B.1.c.1

**Monitoring:**

The permittee shall perform monitoring as described in the most recently approved fugitive dust control plan.

II.B.1.c.2

**Recordkeeping:**

Records required by the most recently approved fugitive dust control plan shall be maintained in accordance with the plan and for a period of five years.

II.B.1.c.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.d

**Condition:**

The permittee shall use only natural gas as a primary fuel and #2 fuel oil as back-up fuel. The #2 fuel oil shall only be used during periods of natural gas curtailment or maintenance firings. Natural gas curtailment is defined as any period when the natural gas provider/supplier imposes an interruption of service, and the curtailment is involuntary and beyond the control of the permittee. Maintenance firings shall amount to no more than 1% of total annualized BTU needs. [Authority granted under R307-401-6(1)[BACT]; condition originated in DAQE-AN0794008-02]

II.B.1.d.1

**Monitoring:**

The permittee shall monitor both primary and backup fuel usage on a monthly basis. The permittee may use meter reading, inventory records, purchase records or other appropriate records. The records shall indicate the reason for using backup fuel (natural gas curtailment, maintenance, etc.). The ratio of backup fuel usage for maintenance firings to total fuel usage shall be calculated every year no later January 31.

II.B.1.d.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.d.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.e

**Condition:**

Visible emissions shall be no greater than 15 percent opacity and shall be no greater than 10 percent opacity at the property boundary, unless otherwise specified. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.1.e.1

**Monitoring:**

Unless otherwise specified, a visual opacity survey of each affected emission unit shall be performed once each day while the unit is operating. The visual opacity survey shall be performed by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. If visible emissions other than condensed water vapor are observed from an emission unit, an opacity determination of that emission unit shall be performed by a certified observer within 24 hours of the initial survey. The opacity determination shall be performed in accordance with 40 CFR 60, Appendix A, Method 9 for point sources, and in accordance 58 FR 61640 Method 203A for fugitive sources.

II.B.1.e.2

**Recordkeeping:**

The permittee shall record the date of each visual survey. The permittee shall also keep a log of the following information for each observed visual emission: date and time visual emissions observed, emission point location and description, time and date of opacity determination, and percent opacity. The records required by this provision and all data required by 40 CFR 60, Appendix A, Method 9 or by 58 FR 61640 Method 203A shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.e.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.f

**Condition:**

Sulfur content of any fuel oil burned shall be no greater than 0.5 percent by weight. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.1.f.1

**Monitoring:**

Sulfur content shall be determined either by testing each fuel delivery of fuel oil or by inspection of the fuel sulfur-content specifications provided by the vendor in purchase records. Sulfur content in either instance shall be determined in accordance with ASTM Method D-4294-89, ASTM Method D-396, or approved equivalent.

II.B.1.f.2

**Recordkeeping:**

For each fuel load received, the permittee shall maintain either fuel receipt records showing sulfur content of the delivered fuel or records of all sulfur content testing performed on the delivered fuel. These records shall be maintained in accordance with Provision I.S.1. of this permit.

II.B.1.f.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2                    **Conditions on Cupola (Emission unit #1)**

II.B.2.a                    **Condition:**

Emissions of CO shall be no greater than 1161 lbs/hr and 13.7 lbs/ton of iron melted.  
[Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.2.a.1                    **Monitoring:**

Stack testing shall be performed as specified here:

(a) Frequency. Emissions shall be tested once every two years, based on the date of the most recent stack test. Tests may also be required at the direction of the Executive Secretary at any time.

(b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.

(c) Sample Point. The emission sample point shall conform to the requirements of 40 CFR 60, Appendix A, Method 1. In addition, Occupational Safety and Health Administration (OSHA) approved access shall be provided to the test location.

(d) Methods.

(1) 40 CFR 60, Appendix A, Method 10 shall be used to determine CO emissions;

(2) 40 CFR 60, Appendix A, Method 2 shall be used to determine stack gas velocity and volumetric flow rate.

(e) Calculations. To determine hourly emission rates (lb/hr, etc.), the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the hourly emission limitation. The mass emission rate (lb/ton) shall be calculated by dividing the hourly emission rate (lb/hr) by the hourly production rate (ton/hr) determined by this permit.

(f) Production Rate During Testing. The operational rate during all compliance testing shall be no less than 90% of the maximum rate achieved in the previous three (3) years.

II.B.2.a.2                    **Recordkeeping:**

Results of all stack testing shall be recorded and maintained in accordance with the associated test method and Provision S.1 in Section I of this permit.



II.B.2.a.3

**Reporting:**

The results of stack testing shall be submitted to the Executive Secretary within 60 days of completion of the testing. Reports shall clearly identify results as compared to permit limits and indicate compliance status. There are no additional reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.b

**Condition:**

Emissions of NO<sub>x</sub> shall be no greater than 0.21 lbs/ton of iron melted. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.2.b.1

**Monitoring:**

Stack testing shall be performed as specified below:

(a) Frequency. Emissions shall be tested once every five years, based on the date of most recent stack test. The source may also be tested at any time if directed by the Executive Secretary.

(b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.

(c) Methods.

(1) Sample Location - the emission point shall conform to the requirements of 40 CFR 60, Appendix A, Method 1, and Occupational Safety and Health Administration (OSHA) approved access shall be provided to the test location.

(2) 40 CFR 60, Appendix A, Method 7, 7A, 7B, 7C, 7D, or 7E shall be used to determine the pollutant emission rate.

(3) 40 CFR 60, Appendix A, Method 2 shall be used to determine the volumetric flow rate.

(d) Calculations. To determine hourly emission rates (lb/hr, etc.), the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the hourly emission limitation. The mass emission rate (lb/ton) shall be calculated by dividing the hourly emission rate (lb/hr) by the hourly production rate (ton/hr) determined by this permit.

(e) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

II.B.2.b.2

**Recordkeeping:**

Results of all stack testing shall be recorded and maintained in accordance with the associated test method and Provision S.1 in Section I of this permit.

II.B.2.b.3

**Reporting:**

The results of stack testing shall be submitted to the Executive Secretary within 60 days of completion of the testing. Reports shall clearly identify results as compared to permit limits and indicate compliance status. There are no additional reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.c

**Condition:**

Emissions of SO<sub>2</sub> shall be no greater than 0.229 lbs/ton of iron melted. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.2.c.1

**Monitoring:**

Stack testing shall be performed as specified below:

(a) Frequency. Emissions shall be tested every five years, based on the date of most recent stack test. The source may also be tested at any time if directed by the Executive Secretary.

(b) Notification. At least 30 days before the test, the source shall notify the Executive Secretary of the date, time, and place of testing and provide a copy of the test protocol. The source shall attend a pretest conference if determined necessary by the Executive Secretary.

(c) Methods.

(1) Sample Location - the emission point shall conform to the requirements of 40 CFR 60, Appendix A, Method 1, and Occupational Safety and Health Administration (OSHA) approved access shall be provided to the test location.

(2) 40 CFR 60, Appendix A, Method 6, 6A, 6B, or 6C shall be used to determine the pollutant emission rate.

(3) 40 CFR 60, Appendix A, Method 2 shall be used to determine the volumetric flow rate.

(d) Calculations. To determine hourly emission rates (lb/hr, etc.), the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary to give the results in the specified units of the hourly emission limitation. The mass emission rate (lb/ton) shall be calculated by dividing the hourly emission rate (lb/hr) by the hourly production rate (ton/hr) determined by this permit.

(e) Production Rate During Testing. The production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

II.B.2.c.2

**Recordkeeping:**

Results of all stack testing shall be recorded and maintained in accordance with the associated test method and Provision S.1 in Section I of this permit.

II.B.2.c.3

**Reporting:**

The results of stack testing shall be submitted to the Executive Secretary within 60 days of completion of the testing. Reports shall clearly identify results as compared to permit limits and indicate compliance status. There are no additional reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.d

**Condition:**

Production of melted iron shall be no greater than 85 tons/hour and 205,000 tons per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.2.d.1

**Monitoring:**

For the annual production limit, within the first 20 days of each month, a 12-month rolling total shall be determined using records from the previous 12 months. For the hourly limitation, the recorded daily production value shall be divided by the operating hours of the day and compared to the limitation. The production and operating hours shall be recorded on a daily basis for all periods of operation.

II.B.2.d.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.d.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.e

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the baghouse. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.2.e.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each day the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 40 CFR 60, Appendix A, Method 9 within 24 hours of the initial observation.

II.B.2.e.2

**Recordkeeping:**

A log of opacity observations shall be maintained in accordance with Provision I.S.1 of this permit. If an observation indicates visible emissions, a notation of those visible emissions shall be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.e.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2.f

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the reagent silo bin vent. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.2.f.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each week the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.2.f.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.2.f.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3

**Conditions on Desulfurization and Ductile System (Emission unit #2)**

II.B.3.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the baghouse. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.3.a.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each day the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.3.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.3.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.4

**Conditions on Core sand silo (Emission unit #4)**

II.B.4.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the bin vent. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.4.a.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each week the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.4.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.4.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5

**Conditions on Core sand handling and core making (Emission unit #5)**

II.B.5.a

**Condition:**

Hours of operation shall be no greater than 18 hours per day and shall be no greater than 3,012.5 hours per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.5.a.1

**Monitoring:**

When operating, hours shall be recorded using an hour meter or operations log. Hours shall be recorded on a daily basis. Annual hours of operation shall be determined within the first 20 calendar days of each month, for the previous month, using operations logs or records. The total shall then be added to the

previous 11 months total for a 12 month rolling total. Any adjustments to the total shall be fully explained and justified.

II.B.5.a.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.5.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5.b

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the baghouse. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.5.b.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each day the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 40 CFR 60, Appendix A, Method 9 within 24 hours of the initial observation.

II.B.5.b.2

**Recordkeeping:**

A log of opacity observations shall be maintained in accordance with Provision I.S.1 of this permit. If an observation indicates visible emissions, a notation of those visible emissions shall be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.5.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6

**Conditions on Sand coating process (Emission unit #6)**

II.B.6.a

**Condition:**

Sand throughput shall be no greater than 4.6 tons/hour and production of coated sand shall be no greater than 2,760 tons per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.6.a.1

**Monitoring:**

For the annual production limit, within the first 20 days of each month, a 12-month rolling total shall be determined using records from the previous 12 months. For the hourly limitation, the recorded daily production value shall be divided by the operating hours of the day and compared to the limitation. The production and operating hours shall be recorded on a daily basis for all periods of operation.

II.B.6.a.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.6.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6.b

**Condition:**

Hours of operation shall be no greater than 18 hours per day and shall be no greater than 1,300 hours per rolling 12-month period. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.6.b.1

**Monitoring:**

When operating, hours shall be recorded using an hour meter or operations log. Hours shall be recorded on a daily basis. Annual hours of operation shall be determined within the first 20 calendar days of each month, for the previous month, using operations logs or records. The total shall then be added to the previous 11 months total for a 12 month rolling total. Any adjustments to the total shall be fully explained and justified.

II.B.6.b.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.6.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.7

**Conditions on Cement lining cement silo (Emission unit #8)**

II.B.7.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the bin vent. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.7.a.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each week the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.7.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.7.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.8

**Conditions on Cement lining sand silo (Emission unit #9)**

II.B.8.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the bin vent. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.8.a.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each week the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.8.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.8.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.9

**Conditions on Special lining operation (Emission unit #11)**

II.B.9.a

**Condition:**

Hours of operation shall be no greater than 18 hours per day. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.9.a.1

**Monitoring:**

When operating, hours shall be recorded using an hour meter or operations log. Hours shall be recorded on a daily basis.

II.B.9.a.2

**Recordkeeping:**

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.9.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.



II.B.9.b

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the baghouse.  
[Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.9.b.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each day the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 40 CFR 60, Appendix A, Method 9 within 24 hours of the initial observation.

II.B.9.b.2

**Recordkeeping:**

A log of opacity observations shall be maintained in accordance with Provision I.S.1 of this permit. If an observation indicates visible emissions, a notation of those visible emissions shall be made in the log. All data required by 40 CFR 60, Appendix A, Method 9 shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.9.b.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.10

**Conditions on Clarifier cement silo (Emission unit #12)**

II.B.10.a

**Condition:**

Visible emissions shall be no greater than 10 percent opacity from the bin vent.  
[Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.10.a.1

**Monitoring:**

A visual observation of each affected emission unit shall be performed once each week the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.10.a.2

**Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.10.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.11                    **Conditions on Miscellaneous (Emission unit #14)**

II.B.11.a                    **Condition:**

Visible emissions shall be no greater than 15 percent opacity for the fugitive emission from the casting building. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.11.a.1                    **Monitoring:**

A visual observation of each affected emission unit shall be performed once each day the unit is operational by an individual trained on the observation procedures of 40 CFR 60, Appendix A, Method 9. The individual is not required to be a certified visible emissions observer (VEO). If any visible emissions are observed, an opacity determination of that emission unit shall be performed by a certified VEO in accordance with 58 FR 61640 Method 203A within 24 hours of the initial observation.

II.B.11.a.2                    **Recordkeeping:**

A log of the visual opacity survey(s) shall be maintained in accordance with Provision I.S.1 of this permit. If an opacity determination is indicated, a notation of the determination will be made in the log. All data required by 58 FR 61640 Method 203A shall also be maintained in accordance with Provision I.S.1 of this permit.

II.B.11.a.3                    **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.12                    **Conditions on VOC and HAP Emission units (Emission unit #15)**

II.B.12.a                    **Condition:**

The emissions of VOCs and HAPs shall not exceed:

355 tons per rolling 12-month period for VOCs  
21.8 tons per rolling 12-month period for HAPs  
7 tons per rolling 12-month period for Xylene  
7 tons per rolling 12-month period for Methyl Ethyl Ketone (MEK)  
7.5 tons per rolling 12-month period for Phenol  
0.25 tons per rolling 12-month period for all metal HAP's combined. [Authority granted under R307-401-6(1) [BACT]; condition originated in DAQE-AN0794008-02]

II.B.12.a.1                    **Monitoring:**

Emissions shall be calculated on a rolling 12-month total. Based on the first day of each month, a new 12-month total shall be calculated using data from the previous twelve months. Monthly calculations shall be made no later than 20 days after the end of each calendar month.

II.B.12.a.2                    **Recordkeeping:**

VOC and HAP emissions shall be determined by maintaining a record of VOC and HAP emitting materials used each month. The records shall include the following data for each material used:

1. Name of the VOC or HAP emitting material, such as pipe coatings.
2. Density of each material used (pounds per gallon).
3. Percent by weight of VOC and HAP in each material used.
4. Gallons of each VOC and HAP emitting material used each month.
5. The amount of VOC and individual HAP emitted monthly by each material used, calculated by the following procedure:

$$\text{VOC} = (\% \text{ VOC by Weight}/100) \times (\text{Density lb/gal}) \times (\text{Gal Consumed}) \times (1 \text{ ton}/2,000 \text{ lb})$$

$$\text{HAP} = (\% \text{ HAP by Weight}/100) \times (\text{Density lb/gal}) \times (\text{Gal Consumed}) \times (1 \text{ ton}/2,000 \text{ lb})$$

6. The total amount of VOC and HAP emitted monthly from all materials used.
7. The amount of VOC and HAP reclaimed for the month shall be similarly quantified and subtracted from the quantities calculated above, to provide the monthly total VOC and HAP emissions.
8. The amount of VOC and HAP emitted monthly from combustion processes shall be estimated based on production or operations data.

II.B.12.a.3

**Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.C. **Emissions Trading.**

(R307-415-6a(10))

Not applicable to this source.

II.D. **Alternative Operating Scenarios.**

(R307-415-6a(9))

Not applicable to this source.

**Section III: PERMIT SHIELD**

The following requirements have been determined to be not applicable to this source in accordance with Provision I.M, Permit Shield:

**III.A. 40 CFR 82, Subpart B (Servicing of Motor Vehicle Air Conditioners)**

This regulation is not applicable to the permitted source (Source-wide) because the permittee does not service motor vehicle air conditioners within the source boundary.

**Section IV: ACID RAIN PROVISIONS.**

**This source is not subject to Title IV. This section is not applicable.**

## REVIEWER COMMENTS

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This operating permit incorporates all applicable requirements contained in the following documents:

DAQE-AN0794008-02

dated August 14, 2002

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**1. Comment on an item originating in Condition 11.A regarding Cupola (Unit 1)**

Test frequency for CO: the test frequency of once of every five years for CO is not sufficient for emissions at 1,161lb/hr of CO from cupola. The test frequency of once every two years is required in this permit. [Comment last updated on 2/13/2003]

**2. Comment on an item originating in DAQE-AN0794008-02 regarding Core sand silo (Unit 4)**

Wet Scrubber: condition 8 of the AO has erroneously listed a wet scrubber as a control device. A bin vent is the control device for this emission unit. 10% opacity limit will apply to the bin vent. Method 203A will be used to determine the opacity. [Comment last updated on 2/13/2003]

**3. Comment on an item originating in DAQE-AN0794008-02 regarding Clarifier cement silo (Unit 12)**

Baghouse: condition 8 of the AO has erroneously listed a baghouse as a control device. A bin vent is the control device for this emission unit. 10% opacity limit will apply to the bin vent. Method 203A will be used to determine the opacity. [Comment last updated on 4/09/2003]

**4. Comment on an item originating in DAQE-AN0794008-02 regarding Desulfurization and Ductile System (Unit 2)**

Baghouse: this baghouse does not have a stack to route the emission out. Method 9 can't be performed. Method 203A will be used to determine the opacity. [Comment last updated on 2/13/2003]

**5. Comment on an item originating in DAQE-AN0794008-02 regarding Cupola (Unit 1)**

condition 8.A. of AO: the opacity limit on the cupola wet scrubber is 30%, which is originated in the old SIP Section IX.H.1.b.I.3 (dated February 27, 1997). The source has been removed from the new SIP (dated July 3, 2002). The new baghouse started operation in early April 2003. The wet scrubber has been permanently removed as the effective date of this permit. Therefore, this condition is not carried into the permit. [Comment last updated on 4/10/2003]